

**IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF  
TENNESSEE AT NASHVILLE**

<b>Chris Sevier</b>  <b>Plaintiff</b>  <b>V.</b>  <b>Apple Inc and Hewlett- Packard</b>		<b>CASE NO: 3:13-cv-00607</b>  <b>Honorable Judge Campbell</b>
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**FIRST AFFIDAVIT OF CHRIS SEVIER**

1. My name is Chris Sevier.
2. I am over 18.
3. I am the Plaintiff and the attorney of record in the above captioned case, proceeding.
4. I am in talks with numerous experts about testifying in this case to make the Defendant's products safe, to make them comply with existing child obscenity laws, and to inflict a blow to the demand side of sex trafficking - protecting women, children, and traditional families.
5. One of the experts I will be calling to testify at trial is Mary Anne Layden, Ph D Director Sexual Trauma and Psychopathology Program Center for Cognitive Therapy at the University of Pennsylvania. Mary Anne Layden, PhD, is a psychotherapist and Director of Education at the

Center for Cognitive Therapy at the University of Pennsylvania. She is the Director of the Sexual Trauma and Psychopathology Program and the Director of the Social Action Committee for Women's Psychological Health. She co-authored the book Cognitive Therapy of Borderline Personality Disorder with C. Newman, A. Freeman and S. Morse. She has written numerous chapters on Cognitive Therapy especially on treatment of Borderline Personality Disorder. She has co-authored a chapter with Linnea Smith called "Adult Survivors of the Child Sexual Exploitation Industry" in Cooper, S. et al (Eds) Medical, Legal, & Social Science Aspects of Child Sexual Exploitation: A Comprehensive Review of Pornography, Prostitution, and Internet Crimes.

6. In terms of Rule 702 of the Federal Rules of evidence, Dr. Layden more than qualifies as an expert. Besides being on the board of Porn Harms, she is literally one of the world leaders who is outspoken against the harm that computer pornography is causing in our world because of our collective non responsiveness to this silent epidemic. Her knowledge, skills, experience, training, and credentials will help the trier of fact to understand the evidence and determine a fact at issue that pornography causes addiction amongst other biological adverse alterations that decrease the quality of one's life. Her inevitable testimony will be based on sufficient fact and data as is self-evident in the documents attached that demonstrate that the porn that Apple and HP expose their customers to is indeed harmful enough to cause their products to be defective and dangerous in their current condition. It is clear from the documents Dr. Layden provided that she will reliably apply the principles and methods to the facts of the case.

7. Dr. Layden and I have spoken about these matters over the phone in detail.

8. Dr. Layden directly served me with statistical data from research studies she was involved with that demonstrate that Apple and HP's products are dangerous and defective in their current condition, as stated of in the motion for a preliminary injunction.

9. The information speaks for itself and demonstrates that the Apple and HP's products are sold in an unsafe and defective manner in light of the states in the complaint, the injunction, and her research.

10. I pray that the Court will use these matters in support of my motion for a preliminary injunction to see that HP and Apple have been engaging in false advertising, that their products must be sold in safe mode, and that pornography is not harmless speech.

11. I provide these documents are self-authenticating, well-sighted, and inherently reliable for purposes of supporting the pending motion for a preliminary injunction.

12. Additionally, before receiving the documents, I started an sole proprietorship business within the United States that opposes pornography. These documents were acquired and generated from Dr. Layden, during the normal course of business in association with our businesses paramount purposes. Accordingly, these documents are self-authenticating business records, fitting within the scope and line of our business objectives. As the Plaintiff in this case, I respectfully submit these documents as part of my business records. It is my opinion, therefore, that the Court can consider these documents for the purposes of ruling on the preliminary injunction under the business records exception to the hearsay rules on top of the fact that Dr. Layden very obviously qualifies as an expert.

12. It is my observation and opinion that the Court can use Dr. Layden's work in deciding whether or not it is probable that the Plaintiff will be successful on the merits for purposes of the preliminary injunction.

13. Dr. Layden's research demonstrates that the pornography that Apple and HP expose their customers to decreases the quality of their lives, causes addiction, increases potential for criminal liability and violence, adversely alters perceptions, hijacks capacity to experience intimacy and form meaningful bonds, and adversely impacts biochemical reward cycles. Accordingly, the products that Apple and HP sell are inherently dangerous and defective.

14. In addition to Dr. Layden, Gary Wilson, the primary analysis and founder at yourbrainonporn.com, and I have been communicating directly about this case.

15. Mr. Wilson's website is one of the primary sources spreading the notion that online pornography is having devastating impact on our culture, our relationships, and our youth. Mr. Wilson is a Physiology Teacher, who is world renown for his analysis of the impact of porn on the brain that has been complied by leading psychologist, therapist, and physicians.

16. On April 12, 2014, Mr. Wilson emailed the following:

I would recommend that you try to enlist the aid of Donald Hilton MD. He is the author/co-author of peer-reviewed articles on the science behind the addictiveness of internet pornography. Here are two of his articles and a rebuttal to another article:

- [Pornography addiction: A neuroscience perspective Hilton DL, Watts C - Surg Neurol Int](#)
- [Pornography addiction - a supranormal stimulus considered in the context of neuroplasticity | Hilton | Socioaffective Neuroscience & Psychology](#)
- ['High desire', or 'merely' an addiction? A response to Steele et al. | Hilton, Jr. | Socioaffective Neuroscience & Psychology](#)

We have heard him speak. He would make an excellent witness. Here is his contact email: [dhiltonjr@sbcglobal.net](mailto:dhiltonjr@sbcglobal.net)

Unfortunately, most of the harm we see in young people shows up in symptoms that are not being researched much. For example, this young man is one of many who have experienced porn-induced ED: [FULL 16x9 piece on ED \(15 mins\)](#) Yet we know of no research into this phenomenon at all.

Another widespread problem is porn tastes that escalate into extreme fetishes. While nearly two thirds of young porn users report this to be the case on forums like [REDDIT.NoFap](#), no one is really researching this phenomenon. Obviously, it makes real relationships much more challenging when vanilla sex "no longer does it" for a young person. This bit of research might be helpful in this regard (excerpt taken from [this extensive critique](#) of a review claiming porn addiction doesn't exist):

In "[Does deviant pornography use follow a Guttman-like progression?](#)" researchers investigated whether desensitization (leading to a need for more extreme material) occurred in individuals who engage in adult pornography at a young age. They found that,

**Excerpt:** individuals with a younger "age of onset" for adult pornography use were more likely to engage in deviant pornography (bestiality or child) compared to those with a later "age of onset".

Perhaps you could get one of the authors to testify for you.

All the best with your efforts,

Gary Wilson

545 Grandview Drive

Ashland, OR 97520

17. Each of the documents sent to me by Gary Wilson are attached. Mr. Wilson's intellectual insights on this matter and his sophisticated analytic skills qualifies him as an expert for purposes of rule 702 of the Federal Rules of Evidence. In the event that he was called to testify. It is abundantly clear that he could demonstrate that the pornographic content that Apple and HP

expose us to through there concerted effort with predatory pornographers makes the products dangerous and defective. Mr. Wilson's testimony would demonstrate that instead of subjecting consumers to "mousetrapping" and "misleading website" scams, they should be subjecting us to a system of accountability that protects us from the tactics of those who scheme to have us dependent on their products and content that the expense of our personal welfare and relationships.

18. Mr. Wilson's email is not provided necessarily to prove the truth of the matter asserted but to demonstrate that his materials he provided are reliable and admissible under other exceptions so that the Court will have an understanding as to what will be attested to at trial to satisfy elements in the motion for an injunction.

18. The information obtained by Mr. Wilson was created in the normal course of business in running a sole proprietorship that fights pornography. Accordingly, the attached documents are self-authenticating business records that the Court can rely on in deciding the motion for a preliminary injunction.

19. Additionally, Dr. Donald Hilton will likely be called to testify at trial. On April 12, 2014, Dr. Hilton invited me to meet at a summit in Washington D.C. in May. If the Court grants the motion there are scores of people - who have a ton of clout and passion in D.C. who are can press the

House and Senate to pass uniform legislation to make all device makers sell their products on safe mode.

20. Dr. Donald Hilton is a neurosurgeon. He will attest to items discussed in this testimonial self-authenticating video: <https://www.youtube.com/watch?v=0ADYe5w75yk>.

Dr. Hilton will discuss how Apple and HP's products adversely impacts the frontal lobe by failing to protect us from interacting with pornography. He will confirm the damaging impact of Apple and HP's products on the brain, as it relates to dopamine and adrenaline.

21. The Court should fact in Dr. Hilton's foreseeable and expected testimony in deciding the motion for a preliminary injunction in order to save time and judicial economy.

23. Here are Dr. Donald Hilton's credentials that cause him to qualify as an expert in this matter:

<b>UNDERGRADUATE EDUCATION:</b>	Port Neches Groves High School Port Neches, Texas 1977 (Elected most likely to succeed by senior class of 541)
<b>MISSIONARY SERVICE:</b>	Bachelor of Science, with highest honors Lamar University, Beaumont, Texas 1983 Church of Jesus Christ of Latter Day Saints South Africa, 1979-1980
<b>MEDICAL EDUCATION:</b>	Doctor of Medicine, with honors University of Texas, Galveston, 1984-1988
<b>INTERNSHIP:</b>	Surgical Internship University of Tennessee, Memphis, TN 1988-1989
<b>RESIDENCY:</b>	Neurosurgery University of Tennessee, Memphis, 1989-1994

**HONORARY AWARDS:** Eagle Scout  
Phi Eta Sigma, 1978  
Phi Kappa Phi, 1982  
Alpha Omega Alpha, National Medical Honor Society, 1988

**LICENSURE:** Texas State Board of Medical Examiners, #H7313, 1994

**CERTIFICATION:** American Board of Neurological Surgery  
11/13/97, #97086  
  
American College of Surgeons, 10/14/99

**PRIVATE PRACTICE:** Neurosurgical Associates of San Antonio, P.A.  
1994 to present

**STAFF APPOINTMENTS:** Chief, Department of Neurosurgery, Santa Rosa Hospital  
Northwest, 1999 to 2000  
  
Chief, Department of Neurosurgery, Baptist Medical Center,  
2001 to 2002  
  
Vice-Chief, Department of Neurosurgery, Southwest Texas  
Methodist Hospital, 2001 to 2003  
  
Chief, Department of Neurosurgery, Southwest Texas  
Methodist Hospital, 2003-2004  
  
Chief, Department of Surgery, Stone Oak Methodist Hospital,  
March 2009 to present



**TEACHING  
APPOINTMENTS:**

The Osler Institute  
Instructor, Neurosurgery Board Review Course  
Chicago, Illinois 1998,  
Houston, Texas November 7, 1998  
Tampa, Florida February 27, 1999  
Atlanta, Georgia September 25, 1999  
Houston, Texas November 15, 1999  
Houston, Texas September 16, 2000  
Houston, Texas November , 2001  
Houston, Texas November 11, 2002

**HOSPITAL AFFILIATIONS:**

American Association of Neurological Surgeons  
Instructor, Goodman Oral Board Review Course  
Houston, Texas, April 21, 2007  
Methodist Hospital  
Methodist Specialty & Transplant Hospital  
Metropolitan Methodist Hospital  
Stone Oak Methodist Hospital  
Baptist Health System

**OFFICES HELD:**

Secretary, Texas Association of Neurological Surgeons, 2004,  
2005 & 2006

**PROFESSIONAL SOCIETIES:**

Bexar County Medical Society  
American Medical Association  
Texas Medical Association  
Texas Association of Neurological Surgeons  
American Association of Neurological Surgeons  
AANS Joint Section on Neurotrauma and Critical Care  
American College of Surgeons  
Texas Medical Association  
Specialty Society Alternate Delegate, May 2000

**RECOGNITION:**

Local and national attention for minimally invasive tubular retractor system for lumbar spine surgery. Locally KENS TV, 11/17/98; nationally with CBS affiliates.

Local and national attention for minimally invasive tubular retractor system for lumbar and cervical spine surgery. Locally KENS TV, June 2002, nationally with CBS affiliates

Best Doctors in America, 2005 - 2012

S.A. Scene Best Doctors - 2006-2008

Texas Super Doctors, 2008-2011

Guide to America's Top Surgeons, Consumers' Research

Council of America, 2007 Edition

MDNews, Methodist Stone Oak Hospital, September 2007

**INVITED FACULTY:**

Medtronic Sofamor Danek, Current Concepts in Minimally Invasive Discectomy, Memphis, TN., July 15, 2000.

Minimally Invasive Spine Convention, Ho Chi Minh City, Viet Nam, May 2000

American Association of Neurological Surgeons Annual Meeting, Minimally Invasive Spine Practical Course, San Francisco, April 2000.

Congress of Neurological Surgeons Annual Meeting, Current Surgical Options for Lumbar Discectomy: Comparison of Results. San Antonio, TX., September 2000.

Medtronic Sofamor Danek, Current Concepts in Minimally Invasive Discectomy”, Memphis, TN, October 7, 2000.

Satellite Training Center  
Southwest Texas Methodist Hospital  
Director, “Minimal Access Spinal Technologies Hands-onLab”  
Medtronic Sofamor Danek  
San Antonio, TX-May 4, 2002

Director, METRx, Lecture Cadaver Course

Houston, November 2002

Satellite Training Center  
Faculty, "Minimal Access Spinal Technologies Hands-on  
Lab"  
Medtronic Sofamor Danek  
Tucson, AZ-January 10-11, 2003

Faculty, "Minimal Access Spinal Technologies Hands-on-  
Lab"  
Medtronic Sofamor Danek  
Meri Institute  
Memphis, TN-February 21, 2003

Faculty, "Minimally Invasive Spine Surgery Practical  
Course".  
American Association of Neurological Surgeons  
Annual Meeting  
Orlando, FL – May 2, 2004

Faculty, "Minimally Invasive Lumbar and Cervical  
Microdiscectomy and X-tube fusion"  
Medtronic Sofamor Danek  
Seattle, WA, July 22-23, 2004

Faculty, "Minimally Invasive Spine Surgery, Current Status"  
University of Texas Health Science Center, Department of  
Orthopedics, Grand Rounds  
San Antonio, TX, September 22, 2004

Faculty, "Minimally Invasive Microdiscectomy"  
American Association of Neurological Surgeons  
73rd Annual Meeting  
New Orleans, LA, April 2005

Faculty, "Modern Techniques and Future Trends in Lumbar  
Interbody Fusion"  
American Association of Neurological Surgeons  
73rd Annual Meeting  
New Orleans, LA, April 2005

Faculty and live surgical demonstration, "Current Concepts in  
Minimally Invasive Spine Surgery"  
Boomin Hospital  
Basan, South Korea, December 7 2006

Faculty, Nuances of Minimally Invasive Spine Surgery  
 Minimally Invasive Lumbar Decompression, Talk  
 Kevin Foley, M.D, Director  
 American Association of Neurological Surgeons Annual  
 Meeting, Chicago, April 2008

Faculty, Nuances of Minimally Invasive Spine Surgery  
 Minimally Invasive Lumbar Decompression, Talk  
 Kevin Foley, M.D, Director  
 Congress of Neurological Surgeons, Annual Meeting  
 Orlando September 2008

Faculty, Minimally Invasive Techniques for Cervical and  
 Lumbar Spinal Surgery  
 Kevin Foley, M.D, Director  
 Congress of Neurological Surgeons, Annual Meeting  
 San Francisco, California October 2010

Invited Speaker, Current Concepts in Minimally Invasive  
 Spine Surgery, University of Texas Health Science Center at  
 San Antonio, Department of Orthopedics  
 San Antonio, Texas September 18, 2010

**PRESENTATIONS:**

"Reduction of Postlaminectomy Epidural Fibrosis in Dogs by  
 a Carbohydrate Polymer", Southern Neurosurgical Society  
 Annual Meeting, Washington, D.C., April 2-5, 1992.

Microdiscectomy with minimally invasive tubular  
 retraction, Texas Association of Neurological Surgeons  
 Meeting, San Antonio, TX, May 25, 2000.

Microdiscectomy with METRx System, Congress of  
 Neurological Surgeons Annual Meeting, San Antonio, TX,  
 September 25, 2000.

Minimally Invasive Approach for Far Lateral Lumbar disc  
 Herniations Using the METRx-MD System, Vardiman AB,  
 Hilton DL, Poster Presentation, AANS/CNS Section on Spine  
 and Peripheral Nerves Annual Meeting, Tampa, FL, March  
 5-8, 2003.

Minimally Invasive Techniques for Intradural Applications,  
 Vardiman AB, Hilton DL, Poster Presentation, AANS/CNS  
 Section on Spine and Peripheral Nerves Annual Meeting,  
 Tampa, FL, March 5-8, 2003.

Recurrent Outpatient Lumbar Disc Surgery Using Minimally

Invasive Tubular Retractor (MITR), Hilton DL, Vardiman AB, Poster Presentation, AANS/CNS Section on Spine and Peripheral Nerves Annual Meeting, Tampa, FL, March 5-8, 2003.

Posterior Cervical Foraminotomy with Three Dimensional Visualization with Minimally Invasive Tubular Retractor (MITR), Hilton DL, Vardiman AB, Oral and poster presentation, AANS/CNS Section on Spine and Peripheral Nerves Annual Meeting, Tampa, FL, March 5-8, 2003.

MAST II, The Next Generation – Minimally Invasive Spinal Surgery, Hilton, DL, Oral Presentation, MAST symposium, Philadelphia; September 28, 2005.

MAST II, The Next Generation – Minimally Invasive Spinal Surgery, Hilton, DL, Oral Presentation, MAST symposium, Boston, October 10, 2005.

Minimally Invasive Spinal Surgery, Oral Presentation, Clinical Orthopedic Society, San Antonio, TX, October 13, 2005.

Minimally Invasive Spinal Surgery, Oral Presentation, Texas Association of Neurological Surgeons (TANS) at annual TMA meeting, Houston, Texas, May 5, 2005 Invited Speaker

**PUBLICATIONS:**

Desiderio DM, Kusmierz JJ, Zhu X, Dass C. Hilton DL, Robertson JT, "Mass Spectrometric Analysis of Opioid and Tachykinin Neuropeptides in Non-secreting and ACTH-secreting Human Pituitary Adenomas". Biological Mass Spectrometry, Vol. 22, pp. 89-97 (1993).

Hilton DL, Jr, Einhaus S, Meric AL, White RP, Schweitzer JP, Park MR, Robertson JT, "Early Assessment of Neurological Deficits in the Fluid-Percussion Model of Brain Injury". Journal of Neurotrauma, Vol. 10, Number 2, 1993.

Hilton DL, Jr., Palmer, S, "METRx Microdiscectomy Surgical Technique", Medtronic Safamor Danek, 2001.

Hilton DL, Jr, "Out-Patient Muscle-Splitting Microdiscectomy" in Perez-Cruet M, Fessler R, (eds) Out-Patient Spinal Surgery, Chapter 11, 2002.

Hilton DL, Jr "Minimally invasive microdiscectomy" in Orthopedics today, Minimal Access Spinal Technologies, Medtronic Sofamor Danek, August 2002.

Hilton DL, Jr. "Minimally Invasive Surgery of the Spine" in McGinty's Operative Arthroscopy, Chapter 67, 2003.

Hilton DL, Jr, "Minimally Invasive Tubular Access for Posterior Cervical Foraminotomy with Three Dimensional Microscopic Visualization and Localization with Anterior/Posterior Imaging", Spine J, (2007) 154-158.

Hilton DL, Jr, Watts CW, "Pornography Addiction: A Neurological Perspective" Surgical Neurology International, manuscript in press, Feb 2010

**ABSTRACTS:**

Park MR, Schweitzer JB, Hilton DL, Robertson JT. "Quantitative Changes in Midbrain Axonal Morphology Correlates with Degree of Head Injury". Society for Neuroscience Annual Meeting, October 1991.

Hilton DL, Schweitzer JB, Park MR, Meric AL, Robertson JT. "Clinical Performance Correlates with Quantitative Axonal Changes Early in Brain Injury". Scientific Program of the 60th Annual Meeting of the American Association of Neurologic

Surgeons, April 11-16, 1992, pg. 317

Hilton DL, Lefler CW, White RP, Robertson JT. "Eicosanoids as an Index of Brain Injury". Scientific Program of the 60th Annual Meeting of the American Association of Neurologic Surgeons, April 11-16, 1992, pg. 318

Hilton DL, Watridge CW, Lowrey R. "Conservative Treatment in Traumatic Blunt Carotid Artery Dissection". Scientific Program of the 61th Annual Meeting of the American Association of Neurologic Surgeons, April 24-29, 1993.

Robertson JT, Hilton DL, Meric AL, Dohan FC, Wujek J. "Reduction of Epidural Scar by a Barrier Agent in a Dog Model of Epidural Fibrosis". Scientific Program of the 61th Annual Meeting of the American Association of Neurologic Surgeons, April 24-29, 1993.

Galvan GM, Vardiman AB, Hilton DL, Fichtel FM. "Same Day Surgery for Intradural Tumors: A report of 3 cases". Digital Poster, Congress of Neurological Surgeons Annual Meeting, September 15-20, 2007.

Galvan GM, Vardiman AB, Hilton DL, Fichtel FM. "Minimally Invasive Surgery Using the METRx-MD System: Techniques for Intradural Applications". Digital Poster, Congress of Neurological Surgeons Annual Meeting, September 15-20, 2007

Dr. Donald L. Hilton, "Spines Will Never Be the Same", NSide MD, San Antonio Medical Journal, Volume II, Issue 2, June, July 2008

**CONTINUING EDUCATION  
COURSE PRESENTER:**

Recorded at AANS Annual Meeting, “Minimally Invasive Cervical Microdiscectomy”, DVD 601D, 2 of 3 Donald L. Hilton, Jr., M.D., Course Presenter, Kevin Foley, M.D., Course Director, American Association of Neurological Surgeons  
Annual Meeting, San Francisco, CA, April 2006

Online Teaching Session. Minimally Invasive Spine Surgery: Lumbar Decompressive Techniques, American Association of Neurological Surgeons website, August 2008

24. Suffice it to say, Dr. Hilton qualifies as an expert and the materials upon which he will be attesting to should be factored in reaching a favorable decision for the Plaintiff on his motion for a preliminary injunction to require the device makers to sell their products on safe mode.



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4/17/14 5:44 PM


Respectfully Submitted,

Best,  
/s/Chris Sevier Esq./  
9 Music Square South  
Nashville, TN 37203  
ghostwarsmusic@gmail.com  
615 500 4411



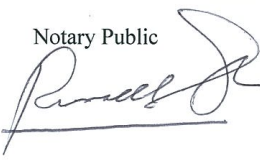
I certify under penalty of perjury that the preceding is true and correct, to the best of my  
knowledge and belief.

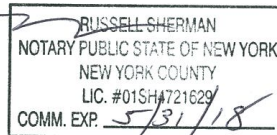
4/17/14  
Date

  
Affiant Mark C. Sevier *TN/DL*

I am a notary public. On this 17th day of April 2014 Mark C. Sevier attested before  
me Russell Sherman

Notary Public

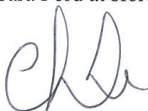
*my commission expires* 



## CERTIFICATE OF SERVICE

This motion was served on opposing counsel through ECF/PACER Filing System to the  
Defendants Attorney's of record to Tom Wiseman at tom@wisemanashworth.com, and Professor  
Sara Ford at sford@lightfootlaw.com

/s/Chris Sevier/  
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Page 1 of 2